

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

JOSEPH ABDUL NOOR EL-KHOURI,

Defendant.

NOTICE OF MOTION

ECF Case

No. 19 Civ. 9744 (LAP)

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PLEASE TAKE NOTICE that upon the Complaint in the above-captioned action; the Indictment in criminal case *United States v. Joseph El-Khoury*, 19 Cr. 652 (JGK) (the “Criminal Case”); and the accompanying memorandum of law, the United States of America, by its attorney Audrey Strauss, Acting United States Attorney for the Southern District of New York, Richard A. Cooper and Daniel M. Tracer, Assistant United States Attorneys, of counsel, will move this Court for an order (i) to intervene in the above-captioned case, pursuant to Rule 24 of the Federal Rules of Civil Procedure; and (ii) a full stay of discovery.

Dated: New York, New York  
September 18, 2020

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By:                     /s/                      
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